

FILED

FEB 27 2020

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT Chattanooga

Clerk, U. S. District Court  
Eastern District of Tennessee  
At Chattanooga

Paula J. Horne  
Labor Standards Unit  
Chattanooga office  
Name of plaintiff (s)

v.

Case No. 1:20-cv-55 PLR/CHS  
(to be assigned by Clerk)

State of Tennessee  
Labor & Workforce Develop  
Commissioner: Jeff McLeod  
Name of defendant (s)

COMPLAINT

1. A short and plain statement of the grounds for filing this case in federal court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

Filed an EEOC Complaint (Nashville), I was  
issued a "Right To Sue Letter" based on  
Harassment & Discrimination. (EEOC requested I file)

2. Plaintiff, Paula J. Horne resides at  
3608 Woodmont Dr., Chattanooga  
street address city

Hamilton, Tn., 37415, (423) 208-0416  
county state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

N/A  
None known at the present time.

3. Defendant, Jeff McCord lives at, or its business is located at  
220 French Landing Dr. Nashville  
street address city  
Davidson Tn. 37243  
county state zip code

(if more than one defendant, provide the same information for each defendant below)

see below...

4. Short and plain statement of your claim (state as briefly as possible the facts of your case and how each defendant is involved. You may use additional paper if necessary):

- (1) Kenneth Nealey: Director of LS Unit: Harassment & Discrimination, Jan Caudill-Admin staff...
- (2) Fred Gaston: Director, DOL HR: Harassment & Discrimination
- (3) Steve Hawkins: Assistant Deputy Commissioner: Harassment & Discrimination
- (4) Logan Bates: HR Rep.: Harassment & Discrimination
- (5) Commissioner Jeff McCord, Melanie Koewler- HR Director, & Tom Herrod, LS Administrator - Assistant to the Commissioner...
- (6) Jan Caudill- Labor Standards Admin Staff- assistant to Director: Kenneth Nealey.
- (7) Tom Herrod: Assistant to Commissioner, LS Unit
- (8) Melanie Koewler- DOL HR-



5. A demand for judgment for the relief you seek (list what you want the Court to do):

- a. Damages, Emotional Distress, Loss of Wages,  
Pain & Suffering = \$5,000,000.00 (Five Millions)
  - b. Continue to work as a State Employee without  
Harassed & Discriminated Against
  - c. Given Equality & Involvement on all special  
promotions & projects without Harassment & Discrimination.
  - d. Honor my FMA papers (USDOJ Violations) completed  
by 4(four) doctors without Harassment & Discrimination.
- No Retaliation - EEOC & ADA Violations.

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge and belief.

Signed this 26<sup>th</sup> day of February, 2020.

Paula J. Horro  
Paula J. Horro  
\_\_\_\_\_  
\_\_\_\_\_

Signature of plaintiff (s)

3608 Woodmont DR.  
Chattanooga, TN. 37415  
(423) 208-0416  
(423) 326-5386